

US EPA RECORDS CENTER REGION 5



484302

CERTIFIED MAIL

June 25, 1986

Mr. David M. Hadzinsky
Government Regulations
Compliance Administrator
Ohio Rubber Company
3911 Ben Hur Avenue
Willoughby, Ohio 44094

Dear Mr. Hadzinsky:

Thank you for your cooperation during our May 14, 1986, compliance inspection.

As we discussed June 2, 1986, via telephone, Ohio Rubber Company is taking the Dept. 118 spray booth (K002) out of service, therefore, a PTO renewal application would not be necessary. Please submit a statement that this source is being shutdown, why the shutdown is occurring, and describe what type of articles were coated within this booth and where these articles will be coated in the future.

During our inspection we reviewed your daily records for coating and solvent usages in sources K001 through K008 and R002. In the Dept. 118 coating booth (K002) the following daily usages were obtained:

<u>Date</u>	<u>Dept.</u>	<u>Gallons</u>	<u>Ohio Rubber Code</u>	<u>Solvent/Coating</u>
7/1/85	118 (K002)	5	M-14	MEK
7/1/85	118	8	M-10	Rubber Solvent
7/1/85	118	6	C-463-50	Chemlok 205 & MEK
7/1/85	118	6	C-808-25	Chemlok 253 & Toluene

25 gal. total

7/2/85	118 (K002)	5	M-14	MEK
7/2/85	118	2	M-10	Rubber Solvent
7/2/85	118	11	C-463-50	Chemlok 205 & MEK
7/2/85	118	16	C-808-25	Chemlok 253 & Toluene

34 gal. total

The usage of more than ten (10) gallons per day of any coating in this source is a violation of the terms and conditions of the Permit to Operate and a specific violation of OAC Rule 3745-21-09 (U), "Surface Coating of Miscellaneous Metal Parts and Products."

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Since the daily records have been kept for the past year and are to be maintained for future use, our office is requiring the submittal of the records for R002, K001, and K003-K008, as can be seen on the enclosed terms and conditions. The exact method of record submittal can be further discussed if necessary.

Please be advised that further violations of these or any other applicable Rules of the Ohio Administrative Code will result in our referral of the violation to our Central Office for appropriate legal action.

During our inspection, two degreasers were examined, namely L001 (Dept. 113) and L002 (Dept. 118). Please update the Appendix L forms for each of these sources (blank copies enclosed).

In reference to continuing odor problems from the Reclaim Building (P006 & P011), Mike Danzig and I reviewed this operation and discussed some measures Ohio Rubber could easily implement to lessen odor emissions. These measures are as follows:

<u>Operation</u>	<u>Steps to be Taken</u>
Dry Mixer	Odor seal on top of Ribbon Blender
Main Reclaim Oil Mixer (Heater)	Odor seal on open corner of mixer top
Small Oil Tanks & Spigots (north of main mixer)	Odor enclosure and extension of spigots to simulate submerged fill

Our office believes these steps are minimum measures which can easily be accomplished by Ohio Rubber. If valid odor complaints continue, it may be necessary to require additional implementation of odor controls to solve this continuing problem or pursue appropriate enforcement action if necessary.

Lastly, we observed an operation which air conveyed dusted rubber pellets (product which originates in your reclaim building - see map attached). Enclosed is a PTO application and Appendix A for your completion and return to our office for this source. Visible emissions were noted from this operation, so some particulate control measure will be required for this source. This application is to be submitted to our office by July 18, 1986. A \$15.00 application fee, payable to the Treasurer of the State of Ohio, must accompany the application.

If you have any questions regarding the content of this letter, please contact me at (216) 425-9171. Again, thank you for your cooperation in these matters.

Sincerely,

DP:c11

Dan Powell
Environmental Scientist
Division of Air Pollution Control

Enclosures

cc: Mike Danzig, Ohio Rubber Company
Leon Weitzel, Lake County Health
Department